



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

June 3, 2013

John Allen, Forest Supervisor
c/o Kevin Larkin, District Ranger
63095 Deschutes Market Road
Bend, Oregon 97701

Re: EPA Region 10 comments on the West Bend Vegetation Management Project Draft Environmental Impact Statement (EPA Project number 10-061-AFS).

Dear Mr. Allen:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the proposed West Bend Vegetation Management Project on the Bend/Ft. Rock Ranger District of Deschutes National Forest in Deschutes County, Oregon. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The DEIS analyzes the Forest Service's proposal to implement treatments that would move the proposed project area towards a more resilient condition and provide a diversity of habitats closer to what historically occurred. Proposed treatments would reduce forest density and fuels in order to promote and sustain late and old structured forest stands, and increase resilience to insects, disease, and stand-replacing wildfire. The project units would be located within a 25,696 acre project area adjacent to the western urban growth boundary of Bend, Oregon. The DEIS analyzes a no action alternative and three action alternatives. Approximately 21,580 acres would be treated under Alternative 2 (Proposed Action), 21,817 acres would be treated under Alternative 3, and 21,509 acres would be treated under Alternative 4. Alternative 3 has been identified as the preferred alternative.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be clear, well organized, and robust. We also appreciate the Forest's responsiveness to issues raised during the scoping process through the development and adoption of Alternative 3 as the preferred alternative. We support the increases in diversity and variability across the landscape proposed under Alternative 3.

We are also supportive of the proposed direction for the Riparian Habitat Conservation Areas. Where silvicultural treatments are needed to achieve or accelerate restoration of system potential riparian conditions we support those treatments. However, our review identified two recommendations related to RHCA management that we believe would strengthen the document as it proceeds to final:

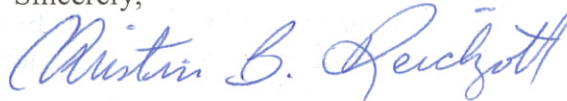
- 1) The DEIS identifies a suite of sites within RHCAs for treatment. In identifying treatments for these areas, it appears that the Forest is relying primarily on Table 4 within the 2012 Northwest Forest Plan Temperature TMDL Implementation Plan. We believe Table 4 is a useful screening

tool that can help to define where it may appropriate to pursue treatment within riparian stands. However, we discourage reliance on Table 4 in crafting site specific silvicultural prescriptions. We recommend that the FEIS clarify that the zones identified in BMP Veg-3 are not prescriptions, and that actual harvest prescriptions will be based on site-specific analysis of the riparian stands selected for treatment.

- 2) The DEIS indicates on p. 65 that approximately 105 acres are proposed for management within the Deschutes River corridor and RHCA. This does not appear to be consistent with later description of activity within the Deschutes RHCA. Table 198, Table 202, and page 435 of the DEIS indicate that a total of 49 acres would be treated within the Deschutes RHCA. We recommend that the FEIS reconcile this apparent discrepancy.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this and other projects as we continue to participate on the Provincial Advisory Committee. If you have any questions about our review, please contact me at 206-553-1601, or by electronic mail at reichgott.christine@epa.gov. Or you may contact Teresa Kubo of my staff at 503-326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

